

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JAMES B. LaFRENTZ and ILA	)	
LaFRENTZ,	)	
	)	
Plaintiffs,	)	
	)	Case No. 4:18-CV-04229
v.	)	
	)	
3M COMPANY, et al.,	)	
	)	
Defendants.	)	

VIDEOTAPED DEPOSITION OF  
JAMES LaFRENTZ - VOLUME I  
Taken on Behalf of Plaintiffs  
November 14, 2018

Susan L. Law, CCR, CSR

1 Q. And do you live in Decatur?

2 A. Yes, I do.

3 Q. How long have you lived here?

4 A. Since June of 2003.

5 Q. Okay. Have you taken any medications today  
6 that might affect your memory or your ability to give  
7 testimony?

8 A. No.

9 Q. Okay. Are you on any medicines today?

10 A. I haven't taken any today.

11 Q. Very good. What's your date of birth?

12 A. November 24, 1944.

13 Q. So you got a birthday coming up here pretty  
14 soon. Are you going to be 74?

15 A. Right.

16 Q. Okay. Where were you born?

17 A. Austin, Texas.

18 Q. And did you grow up in Austin?

19 A. I did.

20 Q. Okay. Are your parents still alive?

21 A. No, they're not.

22 Q. What were their names?

23 A. My father's name was Reginald Jones, and my  
24 mother's name was Lura Wilkes. Lura, L-U-R-A.

25 Q. What did -- what kind of work did your

1           A.    1979 or right in there. '78, '79.

2           Q.    '78 or '79. How long did you work there  
3 for?

4           A.    26 years.

5           Q.    26 years. Does that bring us up to about  
6 2005?

7           A.    That's correct.

8           Q.    Did you retire?

9           A.    Yes, I did.

10          Q.    Okay. Do you remember the date you  
11 retired?

12          A.    January the 1st, 2005.

13          Q.    Okay. Where was General Dynamics located?

14          A.    On the runway of Carswell Air Force Base.

15          Q.    And Carswell, where -- what's the closest  
16 town to that?

17          A.    It's in Fort Worth, Texas.

18          Q.    Okay. How did you go about getting a job  
19 at General Dynamics?

20          A.    Put in an application.

21          Q.    Did you hear that they were hiring or how  
22 did you come to know anything about it?

23          A.    Yes, I'd heard they were hiring buildup for  
24 the F-16.

25          Q.    Okay.

1           A.    And they were hiring a bunch of people, so  
2   I applied.

3           Q.    And the type facility you were working at,  
4   they manufactured what?

5           A.    The main thing was the F-16.

6                   DEFENSE COUNSEL:  Objection.  Leading.

7   BY MR. SHUTTLESWORTH:

8           Q.    What was going on at the General Dynamics  
9   plant at the Air Force base in Fort Worth, Texas?

10          A.    They were building their F-16s.

11          Q.    Okay.  Were you manufacturing aircraft?

12                   DEFENSE COUNSEL:  Objection.  Leading.

13          A.    Yes, we were.

14   BY MR. SHUTTLESWORTH:

15          Q.    All right.  Thanks.

16                   (Court reporter asked for clarification.)

17          A.    Yes, we were.

18          Q.    F-16.  Do you remember any of the other  
19   aircraft that were being manufactured out there?

20                   DEFENSE COUNSEL:  Objection.  Leading.

21                   DEFENSE COUNSEL:  Objection.  Calls for  
22   speculation, lacks foundation, assumes facts not in  
23   evidence, as well as leading.

24   BY MR. SHUTTLESWORTH:

25          Q.    F-16.  Do you remember any of the other

1 Q. Okay.

2 A. But there was 30 or 40 of us in that area.

3 Q. Okay.

4 A. No, I don't remember the -- any workers.

5 Q. All right. How long were you in the parts  
6 fabrication department?

7 A. Oh, probably a little over three years.

8 Q. Okay. So you started in around '79. That  
9 takes us through '81. Is that fair?

10 DEFENSE COUNSEL: Objection. Leading.

11 A. Possibly. Yeah, that's probably right.

12 BY MR. SHUTTLESWORTH:

13 Q. Okay. What were you doing as a drill press  
14 operator?

15 A. Basically anything that needed to be  
16 drilled, I would drill it. I drilled speed brakes out  
17 of raw aluminum. I drilled coupons for testing. I  
18 drilled mostly anything.

19 Q. Okay. What's the --

20 MS. YEE: I'm sorry. Please read it back.

21 (Court reporter read requested testimony.)

22 BY MR. SHUTTLESWORTH:

23 Q. What's a coupon?

24 A. What we called a coupon was a -- came in  
25 three different varieties that I'm aware of. One was

1           A.    Yes, it is.

2           Q.    Just set that up there and we'll talk about  
3   it in a little bit.

4                    Let's talk about the coupons you were  
5   talking about, the drilling of the coupons.  How often  
6   did you drill those when you worked in the -- as a  
7   press operator?

8           A.    I -- varied times I might have a -- they  
9   would bring them out in a plastic bin.

10          Q.    Okay.

11          A.    And there may be 20 or 30 or so in that  
12   bin.  I might have to do this for two days.  I might  
13   have -- not have another bin come out for a month.

14          Q.    Okay.

15                   DEFENSE COUNSEL:  Objection.

16   Nonresponsive.

17   BY MR. SHUTTLESWORTH:

18          Q.    When you're -- when you're going to drill  
19   and test the coupon, how long did it take to drill it,  
20   just one of them?

21          A.    If it -- if you're --

22                   DEFENSE COUNSEL:  Vague and ambiguous,  
23   incomplete hypothetical.

24                   DEFENSE COUNSEL:  Calls for speculation.

25          A.    If it was a single strip --

1 four by four by six cardboard box and handed it to me.

2 BY MR. SHUTTLESWORTH:

3 Q. Okay. Was there any writing on the box?

4 A. It was a 3M dust protector.

5 Q. Do you remember the model or the style  
6 number?

7 A. I think it was 8710.

8 Q. Do you remember what it looked like?

9 A. It was kind of whitish-gray with two yellow  
10 bands on it.

11 Q. Okay. Was there any metal on the mask?

12 A. Yes, run across your nose.

13 Q. Was there anything written on the mask, to  
14 your knowledge?

15 A. I don't remember. I would just get it and  
16 put it on and fit it, go to work.

17 Q. All right. Did you wear this mask when you  
18 were doing the drilling and the clean-up and the  
19 sanding of the coupons?

20 A. Yes.

21 Q. Okay. When you started in '78 or 9 and you  
22 were a drill press operator, did you have any facial  
23 hair at that time?

24 A. No.

25 Q. Okay. Did you ever have any facial hair

1 misstates prior testimony.

2 A. Well, when I took the mask off, I'd  
3 still -- I'd have, like, ash inside the area where the  
4 mask was going to cover.

5 BY MR. SHUTTLESWORTH:

6 Q. What did the outside of the mask look like  
7 when you were done working with the coupons?

8 A. It went from kind of gray-white to kind of  
9 gray-black.

10 Q. And when you were done working, did you  
11 have to wash your face?

12 A. Oh, yes.

13 DEFENSE COUNSEL: Objection. Leading.

14 BY MR. SHUTTLESWORTH:

15 Q. How often would you wear the dust mask when  
16 working with the coupons?

17 A. I would wear it all the time.

18 Q. You wore it when you --

19 A. After I first started wearing them, I wore  
20 it every time I had a coupon bin to do.

21 Q. You wore it when you drilled the coupons?

22 A. Yes.

23 DEFENSE COUNSEL: Objection. Leading.

24 BY MR. SHUTTLESWORTH:

25 Q. You wore it when you sanded the coupons?



1 DEFENSE COUNSEL: Objection. Leading.

2 A. I did.

3 BY MR. SHUTTLESWORTH:

4 Q. And you wore it when you cleaned up after  
5 the work was done?

6 DEFENSE COUNSEL: Objection. Leading.

7 A. I did.

8 BY MR. SHUTTLESWORTH:

9 Q. Did you wear the same 3M 8710 dust mask the  
10 entire three years that you were a drill press  
11 operator?

12 DEFENSE COUNSEL: Objection. Leading.

13 A. I believe I did.

14 BY MR. SHUTTLESWORTH:

15 Q. All right. Are you aware of any other  
16 respiratory protection that you might have used during  
17 that time period?

18 A. I was aware there was some kind of a full  
19 face thing, but you had to go to school on it.

20 Q. Okay. When you'd get the bin of coupons to  
21 work with, all right, would one dust mask get you  
22 through an entire bin or would you have to use more  
23 than one?

24 DEFENSE COUNSEL: Objection. Leading.

25 A. It would depend on how many were in there.